

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | |
|--|--|
| In re BLAKE OF CHICAGO CORP., <i>et al.</i> , Debtors. | Chapter 11 Bankr. Case No. 04-12002 (JLP) Bankr. Adv. No. 05-54141 Jointly Administered |
| A.B. DICK COMPANY and PARAGON CORPORATE HOLDINGS, INC., Plaintiffs, v. MHR CAPITAL PARTNERS LP, MHR INSTITUTIONAL PARTNERS LP, MHRM LP and MHR FUND MANAGEMENT LLC, Defendants. | Civ. Action No. 05-00116-KAJ |
| MHR CAPITAL PARTNERS LP, MHR INSTITUTIONAL PARTNERS LP, and MHRM LP, Third-Party Plaintiffs, v. N.E.S. INVESTMENT COMPANY, <i>et al.</i> , Third-Party Defendants. | Civil Action No. 05-00115-KAJ |

**STIPULATION AND AGREED ORDER EXTENDING TIME WITHIN
WHICH THE MHR DEFENDANTS MAY FILE A REPLY TO PLAINTIFFS' A.B.
DICK COMPANY N/K/A BLAKE OF CHICAGO CORP.'S AND PARAGON
CORPORATE HOLDING, INC.'S MEMORANDUM IN OPPOSITION TO MHR
DEFENDANTS' MOTION TO DISMISS, OR IN THE ALTERNATIVE, FOR
SUMMARY JUDGMENT ON COUNTS II AND III OF THE AMENDED COMPLAINT**

The undersigned parties hereby stipulate and agree that defendants MHR Capital

Partners, LP, MHR Institutional Partners, LP, MHRM, LP, and MHR Fund Management LLC (collectively, the "MHR Defendants") shall have through and including August 15, 2005 to file their reply to Plaintiffs' A.B. Dick Company n/k/a Blake of Chicago Corp.'s and Paragon Corporate Holdings, Inc.'s Memorandum In Opposition To MHR Defendants' Motion To Dismiss Or, In The Alternative, For Summary Judgment On Counts II And III Of The Amended Complaint.

AGREED TO:

JASPAN SCHLESINGER HOFFMAN LLP LANDIS RATH & COBB LLP

/s/ Frederick B. Rosner
Frederick B. Rosner (No. 3995)
913 Market Street, 12th Floor
Wilmington, DE 19801
Tel: (302) 351-8000
Fax: (302) 351-8010

/s/ Kerri K. Mumford
Richard S. Cobb (No. 3157)
Kerri K. Mumford (No. 4186)
919 Market Street, Suite 600
Wilmington, Delaware 19801
Tel: (302) 467-4400
Fax: (302) 467-4450

and

and

**BENESCH FRIEDLANDER COPLAN &
ARONOFF LLP**

H. Jeffréy Schwartz, Esq.
Mark. A. Phillips
2300 BP Tower, 200 Public Square
Cleveland, OH 44114-2378
Tel: (216) 363-4500
Fax: (216) 363-4588

Counsel to the Debtors and Debtors-in-Possession

**KASOWITZ, BENSON, TORRES, &
FRIEDMAN LLP**

David S. Rosner, Esq.
Michael M. Fay, Esq.
Kim Conroy, Esq.
1633 Broadway
New York, NY 10019
Tel: (212) 506-1700
Fax: (212) 506-1800

Counsel to MHR Defendants

IT IS SO ORDERED:

The Honorable Kent A. Jordan
United States District Court Judge